



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE CONFERENCE OF THE)	
NATIONAL ASSOCIATION FOR THE)	
ADVANCEMENT OF COLORED)	
PEOPLE, et al.,)	
Plaintiffs,)	No. 3:20-cv-01039
v.)	Class Action
WILLIAM LEE, et al.,)	Judge Campbell
Defendants)	Magistrate Judge Frensley

**MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO DEFENDANTS'
MOTION TO STAY PROCEEDINGS PENDING APPLICATION FOR
INTERLOCUTORY APPEAL**

Plaintiffs respectfully move this Court for leave to file a sur-reply to address Defendants' assertion that now that discovery is complete, "it is evident that the six named individual Plaintiffs do not have standing to bring their claims in this case." Defs. Rply., ECF 136, at 4. But these claims continue to rely upon Defendants' incorrect assertion—already properly rejected by the Court—that standing is dependent on Plaintiffs' ultimate eligibility for voting rights restoration rather than the procedural injuries alleged.

Plaintiffs assert that a sur-reply is necessary to provide the Court with a complete and accurate picture of the status of the case and the relief being sought by Plaintiffs. The proposed sur-reply is attached hereto as Exhibit A.¹

¹ Counsel for Plaintiffs emailed counsel for Defendants to inquire whether the instant motion is opposed. Defendants responded that they take no position.